

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

RACHEL RITKE

PLAINTIFF,

v.

CRAIG SCHUESSLER and
JENNIFER BURGESS,

DEFENDANTS.

CASE NO: 7:22CV5002-JMG-CRG

**Stipulation for
Protective Order**

STIPULATION

COME NOW, the parties and the Department of Health and Human Services (DHHS), and stipulate to the following:

1. DHHS has been requested to produce child welfare/juvenile services documents related to the following foster parent and time period:

Craig Schuessler, DOB 08/17/1961; between the dates of January 1, 1990 through January 1, 2023.

2. The requested documents include information which is confidential under Nebraska Revised Statutes §§28-719, 722, 725, 726, 730; 43-3001; 68-312 through 68-314; and 68-1209.

3. The parties and DHHS consent to the entry of a Protective Order with the following conditions:

- a. DHHS is required to provide the child welfare/juvenile services documents to the parties, but is permitted to withhold any documents created by third parties, any information that would impede a pending criminal investigation by a law enforcement agency or impede a pending child abuse and neglect investigation by DHHS; any domestic violence Survivor Centered Safety Plan or any documentation that may compromise said safety plan; any attorney-client privileged information;

and information which might identify an individual who made a report of suspected abuse or neglect.

- b. The parties are permitted to use the documents in connection with the above matter, but are prohibited from using or further disclosing the documents for any other purpose.

Dated: March 29, 2023

Respectfully Submitted,

/s/ Jared J. Mazzei

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ORDER

This Court being duly apprised in the premises, finds that the Joint Stipulation should be and hereby is approved, and the parties and DHHS are ordered to comply therewith.

IT IS SO ORDERED.

March 30, 2023.

BY THE COURT:



Cheryl R. Zwart
United States Magistrate Judge